

From: [John Hebert](#)
To: [Meredith Laws](#)
Cc: [Kable Davis](#); [Jennifer Gaines](#)
Subject: Fw: 2nd generation rodenticides in consumer packaging
Date: 01/28/2010 08:34 PM
Attachments: [\[Untitled\].pdf](#)

Meredith - I sent this email to you in Dec. The only way he can sell his product as a PCO/Ag/Consumer is if it is sold in some sort of bait station and limited to 1 lb or less. This applies to all consumer products but that really doesn't make any business sense to me. What PCO would buy this? But will still may not even allow it b/c we always said that we wanted to be able to track homeowner products (with unique Reg. Nos) if there are incidents. I don't mind participating in the conference call. Did he send you a copy of the email where I put this in writing? He says I put it in writing??? If I said that I was wrong. Send me the invite....when he sent me the original invite I delegated it to Bo (I enjoyed doing that, btw....)

john

-----Forwarded by John Hebert/DC/USEPA/US on 01/28/2010 08:20PM -----

To: Meredith Laws/DC/USEPA/US@EPA
From: John Hebert/DC/USEPA/US
Date: 12/18/2009 12:53PM
cc: Jennifer Gaines/DC/USEPA/US@EPA
Subject: Fw: 2nd generation rodenticides in consumer packaging

This is what I sent him. Yes, it is a (difenacoum) label that has PCO, Ag and consumer sublabels. But the approval letter clearly states that the registration will be cancelled after June 2011. I did not tell him that he could have a consumer sublabel with an AG/PCO label(s) under the new mitigation. I guess it would be OK to have the sublabels if the all three limited the sale of the product in 1lb. packages or less. But that doesn't make sense for PCO/Ag product. Let me know if you still have some questions about this.

Sorry for the confusion....

John

----- Forwarded by John Hebert/DC/USEPA/US on 12/18/2009 12:46 PM -----

From: John Hebert/DC/USEPA/US
To: "Jim Barron" <jbarron@exponent.com>
Date: 05/29/2009 10:15 AM
Subject: Re: 2nd generation rodenticides in consumer packaging

Jim - That's exactly right. Everything is spelled out in the attached approval letter for that label.

John

"Jim Barron" ---05/29/2009 10:05:54 AM---John, Thanks again for this label. But I did not think that this active let alone any of the other 2

From: "Jim Barron" <jbarron@exponent.com>

To: John Hebert/DC/USEPA/US@EPA

Date: 05/29/2009 10:05 AM

Subject: 2nd generation rodenticides in consumer packaging

John,

Thanks again for this label. But I did not think that this active let alone any of the other 2nd generation rodenticide actives would be allowed any longer in a consumer sized product. Is this an interim label good only until June 2011?

Thanks for your response.

Jim

Jim Barron, Ph. D.
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-----Original Message-----

From: Hebert.John@epamail.epa.gov [<mailto:Hebert.John@epamail.epa.gov>]
Sent: Thursday, May 28, 2009 4:38 PM
To: Jim Barron
Subject: Re: split label example

Jim - see attached. Let me know if you have any questions.

john

(See attached file: [Untitled].pdf)

From: "Jim Barron" <jbarron@exponent.com>

To: John Hebert/DC/USEPA/US@EPA

Date: 05/28/2009 04:03 PM

Subject: split label example

John,

Thanks for the phone discussion today about split labels for the rodenticides. I appreciate your agreeing to send me a recent example, as I have several to set up this way.

Jim

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